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7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2011-793

13 **KAREN LEE WILLIAMSON**
21518 East Lords Court
Queen Creek, AZ 85242

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL**

14 and

[Bus. & Prof. Code § 495]

15 **3930 East Battala Ave**
Gilbert, AZ 85297

16 **Registered Nurse License No. 441765**

17 Respondent.
18

19
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
21 entitled proceedings that the following matters are true:

22 PARTIES

23 1. LOUISE R. BAILEY, M.ED., RN (Complainant) is the Executive Officer of the
24 Board of Registered Nursing. She brought this action solely in her official capacity and is
25 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
26 Shana A. Bagley, Deputy Attorney General.
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1 9. Respondent agrees that her Registered Nurse is subject to discipline and she agrees to
2 be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

3 CIRCUMSTANCES IN MITIGATION

4 10. Respondent Karen Lee Williamson has never been the subject of any disciplinary
5 action. She is admitting responsibility at an early stage in the proceedings.

6 CONTINGENCY

7 11. This stipulation shall be subject to approval by the Board of Registered Nursing.
8 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
9 Registered Nursing may communicate directly with the Board regarding this stipulation and
10 settlement, without notice to or participation by Respondent. By signing the stipulation,
11 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind
12 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
13 this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order for
14 Public Repeval shall be of no force or effect, except for this paragraph, it shall be inadmissible in
15 any legal action between the parties, and the Board shall not be disqualified from further action
16 by having considered this matter.

17 12. The parties understand and agree that facsimile copies of this Stipulated Settlement
18 and Disciplinary Order for Public Repeval, including facsimile signatures thereto, shall have the
19 same force and effect as the originals.

20 13. This Stipulated Settlement and Disciplinary Order for Public Repeval is intended by
21 the parties to be an integrated writing representing the complete, final, and exclusive embodiment
22 of their agreement. It supersedes any and all prior or contemporaneous agreements,
23 understandings, discussions, negotiations, and commitments (written or oral). This Stipulated
24 Settlement and Disciplinary Order for Public Repeval may not be altered, amended, modified,
25 supplemented, or otherwise changed except by a writing executed by an authorized representative
26 of each of the parties.

1 14. In consideration of the foregoing admissions and stipulations, the parties agree that
2 the Board may, without further notice or formal proceeding, issue and enter the following
3 Disciplinary Order:

4 DISCIPLINARY ORDER

5 IT IS HEREBY ORDERED that Registered Nurse License No. 441765 issued to
6 Respondent Karen Lee Williamson shall, by way of letter from the Board's Executive Officer, be
7 publicly reprovod. The letter shall be in the same form as the letter attached as Exhibit "B" to this
8 stipulation.

9 ACCEPTANCE

10 I have carefully read the Stipulated Settlement and Disciplinary Order for Public Reapproval.
11 I understand the stipulation and the effect it will have on my Registered Nurse License. I enter
12 into this Stipulated Settlement and Disciplinary Order for Public Reapproval voluntarily,
13 knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of
14 Registered Nursing.

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16 DATED: 4-28-2011 Karen Lee Williamson RN

17 KAREN LEE WILLIAMSON
18 Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order for Public Reproval is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: April 19, 2011

JMSY

Respectfully submitted,

~~KAMALA D. HARRIS~~
~~Attorney General of California~~

~~DIANN SOKOLOFF~~
~~Supervising Deputy Attorney General~~

SHANA A. BAGLEY
Deputy Attorney General
Attorneys for Complainant

SF2010900554/ Stipulation for public reproval.rtf

Exhibit "A"

Accusation No. 2011-793

1 KAMALA D. HARRIS
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2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 SHANA A. BAGLEY
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4 State Bar No. 169423
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8 BEFORE THE
BOARD OF REGISTERED NURSING
9 DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

10
11 In the Matter of the Accusation Against:

Case No. 2011-793

12 KAREN LEE WILLIAMSON, a.k.a.
KAREN KUSMIERZ WILLIAMSON,
13 a.k.a. KAREN LEE KIEL
21518 East Lords Court
14 Queen Creek, AZ 85242

ACCUSATION

15 Registered Nurse License No. 441765

16 Respondent.

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18 Complainant alleges:

19 PARTIES

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about July 31, 1989, the Board of Registered Nursing issued Registered Nurse
24 License Number 441765 to Karen Lee Williamson, also known as Karen Kusmierz Williamson,
25 also known as Karen Lee Kiel (Respondent); The Registered Nurse License expired on
26 September 30, 2010, and has not been renewed.

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JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 118, subdivision (b), of the Business and Professions Code (Code) provides that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

5. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

6. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b), of the Code, the Board may renew an expired license at any time within eight years after the expiration.

STATUTORY PROVISION

7. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

"...

"(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action."

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1 COST RECOVERY

2 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 CAUSE FOR DISCIPLINE

7 (Unprofessional Conduct – Out of State Discipline)
8 (Bus. & Prof. Code §2761(a)(4))

9 9. Respondent has subjected her Registered Nurse License to disciplinary action under
10 Code section 2761, subdivision (a)(4), in that on or about September 24, 2009, in a prior
11 disciplinary action entitled In the Matter of the Against in the Matter of Registered Nurse
12 License RN069359 Issued to Karen Kusmierz Williamson before the Arizona State Board of
13 Nursing (Arizona Board) in Case Number 0804059, the Arizona Board entered a Decision
14 ordering that Respondent's registered nurse license be probated. Specifically, Respondent signed
15 a Consent Agreement, wherein she agreed to a disciplinary order as follows: her license was
16 placed on probation for three years, and she agreed to complete psychological counseling, submit
17 to random drug testing, abstain from the use of alcohol and unauthorized drugs, and comply with
18 other terms and conditions. That decision is now final and is incorporated by reference as if fully
19 set forth.

20 10. The Arizona Board based its decision on Respondent's actions on or about April 24,
21 2008. In that case, a complaint was filed with the Arizona Board alleging that Respondent
22 exhibited inconsistent behaviors and possible impairment and memory difficulties, which had the
23 potential of resulting in unsafe patient care while working as a registered nurse at Mercy Gilbert
24 Medical Center in Gilbert, Arizona. On or about September 5, 2007, Respondent was terminated
25 for insubordination, substandard work, and violation of company policy.

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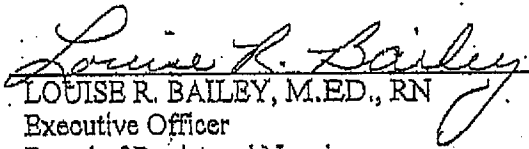
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PRAVER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 441765, issued to Karen Lee Williamson, also known as Karen Kusmierz Williamson, and also known as Karen Lee Kiel;
2. Ordering Karen Lee Williamson, also known as Karen Kusmierz Williamson, and also known as Karen Lee Kiel, to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and
3. Taking such other and further action as deemed necessary and proper.

DATED: March 22, 2011


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

SF2010900554/ accusation.rtf

Exhibit "B"

Letter of Public Reproval in Case No. 2011-793



June 30, 2011

Karen Lee Williamson
3930 East Battala Avenue
Gilbert, AZ 85297

Re: LETTER OF PUBLIC REPROVAL
In the Matter of the Accusation Against:
KAREN LEE WILLIAMSON, RN License No. 441765
Board of Registered Nursing Case No. 2011-793

Dear Ms. Williamson:

On March 22, 2011, the Board of Registered Nursing, Department of Consumer Affairs, State of California, filed an Accusation against your Registered Nurse License. The Accusation alleged that you engaged in unprofessional conduct under Business and Professions Code section 2761, subdivision (a)(4), for license discipline in another state.

On September 24, 2009, your nursing license was disciplined by the Arizona State Board of Nursing. The underlying conduct supported the Arizona board's disciplinary action is that you exhibited inconsistent behavior and possible impairment and memory difficulties, which may have potentially resulted in unsafe patient care while working as a registered nurse at Mercy Gilbert Medical Center in Gilbert, Arizona. As part of your probationary terms, you were placed on probation for three years, ordered to complete psychological counseling, required to submit to random drug testing and abstain from the use of alcohol and unauthorized drugs, and to comply with other terms and conditions.

You have complied with and completed the terms of probation ordered by the Arizona State Nursing Board. The underlying actions that gave rise to the out of state discipline was an isolated event and is three years old. A report from an Arizona Board appointed psychologist reported that you have successfully completed your counseling therapy with him, that you did not exhibit signs of problems with your memory or substance abuse and there was no reason to require work restriction on your license. You have been licensed by the California Board of Registered Nursing since 1989 without prior discipline. Your nursing license with the California Board of Registered Nursing is in an inactive status. Taking into consideration the above-listed factors, the Board has decided that the charges warrant a public reproof.

Accordingly, in resolution of this matter under the authority provided under Business and Professions Code section 495, the board of Registered Nursing, Department of Consumer Affairs

Karen Williamson

RN 441765

Page 2

issues this letter of public reproof.

Sincerely,

Louise R. Bailey, M.Ed., RN

LOUISE R. BAILEY, M.Ed., RN

Executive Officer

Board of Registered Nursing

Department of Consumer Affairs